

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL ACTION
)
JOHN D. WOODBURY) NO. 1:24-CR-00218
)
)

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL
MOTIONS

Defendant JOHN D. WOODBURY, through undersigned counsel, files this motion for extension of time to file pretrial motions. Pretrial motions are due on October 7, 2024. A pretrial conference is set for October 10, 2024. Defendant requests the Court allow him at least an additional 30 days to file pretrial motions. This would make motions due on November 6, 2024. Defendant further requests the pretrial conference be scheduled after November 6, 2024. In support of this motion, Defendant submits the following:

- 1) Mr. Woodbury entered a not guilty plea to the two-count indictment at his arraignment on July 18, 2024.
- 2) The parties need additional time to negotiate a pretrial resolution to this matter. The parties have conferred and believe a mutually agreeable decision can be reached within the next 30 days.

3) Assistant United States Attorney Jennifer Keen, counsel for the government, has no objection to the granting of this Motion.

4) The period from the filing of this motion through the pretrial conference is properly excluded from the speedy trial clock because the ends of justice served by granting this extension of time outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A).

WHEREFORE, Defendant respectfully requests the Court continue the pretrial conference and allow him at least an additional 30 days to file motions.

This 4th day of October 2024

Respectfully submitted,

/s/ Keenen J. Twymon
STATE BAR NO. 994921
ATTORNEY FOR JOHN D. WOODBURY

FEDERAL DEFENDER PROGRAM, INC.
Suite 1500, Centennial Tower
101 Marietta Street, N.W.
Atlanta, Georgia 30303
(404) 688-7530
keenen_twymon@fd.org

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to counsel of record for the government.

This 4th day of October 2024

/s/ Keenen J. Twymon
KEENEN J. TWYMON
GEORGIA BAR NO. 994921
ATTORNEY FOR JOHN D. WOODBURY

Federal Defender Program, Inc.
Centennial Tower, Suite 1500
101 Marietta Street, N.W.
Atlanta, Georgia 30303
Ph: (404) 688-7530
Fax: (404) 688-0768
keenen_twymon@fd.org